

Exhibit A



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 8, 2016

BY EMAIL

Avi Weitzman, Esq.
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Re: *United States v. Kaleil Isaza Tuzman*, S8 15 Cr. 536 (PGG)

Dear Mr. Weitzman:

We write in response to your letter of December 16, 2016 requesting a bill of particulars. We have carefully reviewed each of your requests. In the first instance, we note that you are seeking information and evidence to which the defendant is not entitled under the criminal discovery process. We direct your attention to the detailed, 69-page Indictment, which sets forth in great detail the crimes alleged and the defendant's role in these crimes. Substantial additional detail has been furnished in the discovery productions, which have been produced largely in electronically searchable format and accompanied by itemized indices. We have also identified the names and roles of the three witnesses who have pleaded guilty to cooperation agreements and produced or made available relevant documents from the files of these witnesses. In light of those materials, we do not believe a bill of particulars is warranted in this case, and we do not intend to produce one.

However, while we are under no obligation to do so, we will voluntarily provide you with certain of the information you have requested, in order to facilitate your review of the Indictment and discovery. Specifically, we agree to (a) identify all known co-conspirators, and to supplement this information to the extent additional co-conspirators are identified; (b) as to Count Four, refer you to examples of acts committed within the statute of limitations period; and (c) as to Count Five, identify examples of the use of interstate wires made in furtherance of the charged scheme.

Very truly yours,

PREET BHARARA
United States Attorney

by: /s/Andrea M. Griswold
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